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**LIFE INSURANCE COMPANY
OF NORTH AMERICA**
d.b.a. CIGNA GROUP INSURANCE

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

DEBORAH VENTO,) Case No.: C 08-02128 JL
)
Plaintiff,) **JOINT STIPULATION AND**
) **[PROPOSED] ORDER EXTENDING**
) **DEFENDANT LINA'S TIME TO**
) **ANSWER PLAINTIFF'S COMPLAINT**
)
v.)
)
LIFE INSURANCE COMPANY OF)
NORTH AMERICA d.b.a. CIGNA GROUP)
INSURANCE; AND DOES 1 THROUGH 100,)
) Removal – April 24, 2008
)
Defendants.)
)

The Plaintiff DEBORAH VENTO (“VENTO”) and Defendant LIFE INSURANCE COMPANY OF NORTH AMERICA d.b.a. CIGNA GROUP INSURANCE (“LINA”), hereby submit this Joint Stipulation and [Proposed] Order providing for a 10 court day extension to the original deadline of April 30, 2008 for LINA to file its answer to the Complaint in this matter.

1. On April 2, 2008, Plaintiff VENTO served Defendant LINA by First Class Mail with a summons and complaint in this matter through CT Corporation System.

2. On April 24, 2008 Defendant LINA removed this matter from Alameda County Superior Court to United States District Court, Northern District, San Francisco Division.

LINA'S answer or other response to the Complaint is currently due on April 30, 2008.

3. Defendant LINA needs additional time to answer Plaintiff VENTO'S Complaint and the Parties propose to extend the deadline for 10 court days from the original deadline of April 30, 2008.

4. Accordingly, Plaintiff VENTO and Defendant LINA jointly submit this Stipulation and Proposed Order requesting that the Court extend the deadline for LINA to answer Plaintiff's Complaint up to and including Wednesday, May 14, 2008.

IT IS SO STIPULATED.

DATED: April 30, 2008

By: /s/ Timothy J. Fricker
FRICKER & MELLEN & ASSOCIATES
Timothy J. Fricker
Attorneys for Plaintiff
DEBORAH VENTO

DATED: April 30, 2008

By: /s/ Michael K. Brisbin
WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP
Michael K. Brisbin
Attorneys for Defendant
**LIFE INSURANCE COMPANY OF
NORTH AMERICA d.b.a. CIGNA
GROUP INSURANCE**

ORDER

In light of the above Stipulation of the Parties regarding the extension for Defendant LINA to answer Plaintiff's Complaint, and good cause appearing therefore, the Court hereby orders that:

(1) Defendant LINA shall have 10 additional court days from the original deadline of Wednesday, April 30, 2008 to file an answer to Plaintiff's Complaint; and

(2) Defendant LINA must file its answer to Plaintiff's complaint no later than Wednesday, May 14, 2008.

IT IS SO ORDERED.

DATED: _____, 2008

**HONORABLE JAMES LARSON
UNITED STATES DISTRICT COURT JUDGE**

PROOF OF SERVICE

I am a citizen of the United States, I am over the age of eighteen years not a party to the within cause; I am employed in the City and County of San Francisco, California and my business address is 525 Market Street, 17th Floor San Francisco, California 94105.

On this date I served the following document(s):

**JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING
DEFENDANT LINA'S TIME TO ANSWER PLAINTIFF'S COMPLAINT**

on the party(ies) identified below, through their attorneys of record, by placing true copies thereof in sealed envelopes addressed as shown below by the following means of service:

XX: By First Class Mail -- I caused each such envelope, with first class postage thereon fully prepaid, to be deposited in a recognized place of deposit of the U.S. Mail in San Francisco, California, for collection to the office of the addressee following ordinary business practices.

____: **By Personal Service** -- I caused each such envelope to be given to a courier messenger who personally delivered each such envelope to the office of the addressee.

____: **By Overnight Courier** -- I caused each such envelope to be given to an overnight mail service at San Francisco, California, to be hand delivered to the office of the addressee on the next business day.

: **Facsimile** -- (Only where permitted. Must consult CCP §1012.5 and California Rules of Court 2001-2011. Also consult FRCP Rule 5(e). Not currently authorized in N.D.CA.)

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DEBORAH VENTO

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

EXECUTED April 30, 2008, at San Francisco, California.


Joya Yeung